

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Warren Steel Holdings - Removal Polrep
Initial Removal Polrep

US EPA RECORDS CENTER REGION 5



537724



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Initiation of Time Critical Removal Action
Warren Steel Holdings
C5AV
Warren, OH
Latitude: 41.2629796 Longitude: -80.7990185

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From: Stephen Wolfe, OSC
Date: 4/27/2018
Reporting Period: 04/23/2018 through 04/27/2018

1. Introduction

1.1 Background

Site Number:	C5AV	Contract Number:	
D.O. Number:		Action Memo Date:	2/20/2018
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/27/2017	Start Date:	4/27/2017
Demob Date:	6/2/2017	Completion Date:	6/2/2017
CERCLIS ID:	OH0011207	RCRIS ID:	QHD066060608
ERNS No.:		State Notification:	yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action

NOTE: POLREPS 1 and 2 were for emergency response actions (initial and final) that occurred 04/27/17 through 6/02/2017

1.1.2 Site Description

WSH is a former 400-acre steel manufacturing facility. The site was in operation from at least the 1940s, and all operations official ceased at the facility in January 2016. EPA is gathering all drums and containers of hazardous waste that was abandoned at the facility as well as inspecting approximately 100 transformers for possible pcb oil/threat to waterway.

1.1.2.1 Location

4000 Mahoning Street, Warren, Ohio.

1.1.2.2 Description of Threat

EPA and Ohio EPA documented abandoned drums/totes/other containers containing hazardous waste (corrosives, pcb oil, used oil) at the site. EPA performed a site assessment on April 27, 2017 and documented that some of the material had a pH of 1-2 standard units and 14 standard units. A sample of oil from a pit on the site tested positive for pcbs at 90 ppm. Labeling is present on the majority of the containers indicating sulfuric acid, caustics, and water treatment chemicals.

Approximately 100 transformers are present on site, half of which are located near the bank of the

Mahoning River. No data is available on whether or not the transformers contain oil/pcb oil. EPA will investigate the transformers as part of the Removal Action and handle appropriately.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Information from Ohio EPA and the EPA site assessment indicated the presence of caustic material (acid and bases) as well as used, oil, and pcb contaminated oil. The EPA site assessment noted the presence of possible asbestos containing materials; however, asbestos removal is not a part of this removal action. EPA will address any loose asbestos if the material inhibits the ability to gather the containers of hazardous waste.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

This is a Time Critical Removal Action focusing on the removal of drums and other containers of hazardous waste. Electrical Transformers will also be inspected to determine if they are full of oil/pcb oil.

2.1.2 Response Actions to Date

See POLREP #1 and #2 for emergency response actions from April 27 through June 2, 2017.

On Tuesday, April 24, 2018 EPA and their contractors mobilized to site to begin removal actions. Activities for the day included site orientation for the crew, Health and Safety Briefing, and equipment delivery. EPA and ERRS met with representatives from the operating facility that shares the site entrance and discussed EPA actions and made sure that any actions would not interfere with their day to day operations. ERRS and START began inspecting all buildings to create an inventory of drums and containers throughout the site. ERRS collected a bulk sample of suspect ACM located on top of totes of acid and delivered the sample to a laboratory for analysis.

On Wednesday, April 25, 2018, EPA met with the local police and fire department to discuss activities that will be occurring on the site. ERRS and START continued inventorying the drums and containers on site. ERRS began clearing and setting up a drum staging area. START collected air samples (attached to crew members and static) for asbestos for health and safety purposes. EPA and ERRS met with a representative from EnviroServe who has approximately 10 containers (vacuum boxes and roll off boxes) of K061 waste left on site for approximately 1 year due to non-payment. Analytical results for the bulk sample of suspect ACM was received and the sample result was positive for asbestos.

On Thursday, April 26, 2018, ERRS began moving empty containers to the staging area and collected bulk samples of suspect ACM material in a building with drums. Approximately 100 half full poly drums (water) had been staged at the edge of pits to provide a barrier for the site security guards to mark a safe pathway. ERRS collected material from the drums for a pH test to verify the drums contained water (ph was between 4-5 standard units) and the drums will be left in place for the site security guards. Asbestos air samples and bulk PACM samples were delivered to the laboratory for analysis. START and ERRS continued with the site inventory and there are approximately 500 containers on site (to date).

On Friday, April 27, 2018, ERRS collected a sample from a machine pit that contained some oil material for pcb analysis and delivered the sample to the laboratory. ERRS continued gathering empty drums and containers and moving them to the staging area. ERRS pumped approximately 400 gallons of pcb contaminated oil/water from a pit into totes. START collected additional personnel air samples for asbestos. EPA and ERRS counted approximately 130 transformers on site that will require assessment.

Daily air monitoring (particulate) is being performed by START in dusty areas. Acid gas monitoring will be performed when drum sampling is initiated.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Ongoing.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

Continue gathering all drums and containers, sample/profile and dispose
Investigate transformers
Investigate options for containerized K061 wastes

2.2.1.1 Planned Response Activities

gather/sample/dispose of hazardous materials located in drums/totes and other containers throughout the site
investigate (sample for pcbs) and drain transformers located on site

2.2.1.2 Next Steps

ERRS located a local company that historically sampled the on-site transformers (1980s-2015). ERRS will arrange a meeting with the company to discuss historical results and potential assistance moving forward.

2.2.2 Issues

A representative from EnviroServe (owns the vacuum boxes/roll off boxes) of K061 material was on site and informed EPS/ERRS that if the material sits in the containers too long (greater than a month) the material sets up and costs are high to remove the material for disposal (>\$50,000). ERRS is exploring options for disposal.

2.3 Logistics Section

ERRS provided all logistics for the site

2.4 Finance Section

2.4.1 Narrative

EPA Branch Chief verbally authorized a \$50,000 ceiling for the Emergency Removal.

An Action Memo was signed on February 2, 2018 for the time critical removal action with a ceiling limit of \$1,878,830 for removal actions. A delivery issue was issued to ERRS for \$300,000 to begin response actions.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$300,000.00	\$49,213.00	\$250,787.00	83.60%
TAT/START	\$33,850.00	\$5,637.00	\$28,013.00	82.76%
Intramural Costs				
Total Site Costs	\$333,850.00	\$55,050.00	\$278,800.00	83.51%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

A Site HASP was developed by ERRS. The site HASP was presented to the ERRS crew and each Activity Hazard was discussed with the personnel as part of the site orientation. Due to the large size of the site and numerous pits and small rooms, ERRS will utilize the "buddy" system when investigating all areas of the buildings.

Suspect ACM material has been confirmed through sampling and analysis. ERRS will treat any material on top of drums/containers as ACM and handle appropriately prior to moving the container (wet, double bag, Level C PPE). In addition, the interior of some buildings are extremely dusty and Level C PPE will be worn as a precaution in the building in order to gather containers.

2.5.2 Liaison Officer

OSC Steve Wolfe

2.5.3 Information Officer

OSC Steve Wolfe

3. Participating Entities

3.1 Unified Command

OSC Steve Wolfe

3.2 Cooperating Agencies

OSC Steve Wolfe

4. Personnel On Site

- 1 EPA
- 1 START
- 7 ERRS

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report
response.epa.gov/WSH

6.2 Reporting Schedule

7. Situational Reference Materials

NCP and CERCLA.